

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243
Judge Campbell
Magistrate Judge Frensley

**DECLARATION OF
TERENCE W. McCORMICK
IN OPPOSITION TO THIRD-PARTY
WITNESS ROY BLANKENSHIP'S
MOTION TO QUASH AND FOR A
PROTECTIVE ORDER**

Terence W. McCormick declares under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct:

I, Terence W. McCormick, submit this Declaration in support of Guidepost Solutions LLC's ("Guidepost") Response in Opposition to the motion by third-party witness Roy Blankenship ("Blankenship") for a protective order and to quash Guidepost's subpoena for testimony and documents and hereby state, aver, and declare the following:

1. I am a partner in the firm Mintz & Gold LLP, counsel to Guidepost in this action.
2. In the course of discovery in this action, Guidepost produced, among other items, five audio recordings. As set forth more fully in the Declaration of Samantha Kilpatrick and the accompanying memorandum of law, these audio recordings were originally provided to two Guidepost investigators by a Baptist clergy person whose wife alleged she had been sexually assaulted by Plaintiff Johnny Hunt ("Hunt") in July 2010.
3. Prior to this firm's producing the audio recordings to Hunt's counsel on behalf of our client, I obtained copies and listened to them.

4. The audio recordings have [REDACTED]

5. I am aware that Blankenship has moved to quash a subpoena that Guidepost served on him in this action, citing the Georgia clergy-penitent privilege.

6. However, [REDACTED]

7. [REDACTED]

8. However, viewed in the totality of the circumstances, the balance of the recordings of the counseling sessions reveals that most if not all communications between the accuser, her husband, and Blankenship would be hard to distinguish from those one might expect to be exchanged with a secular marriage counselor, [REDACTED]

9. As stated in the accompanying memorandum of law, to the extent required, Guidepost is prepared to submit these recordings to the Court *in camera* to protect the accuser's privacy. They have already been produced to Hunt's counsel under an Attorney's Eyes-Only designation.

* * * * *

10. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 3, 2024, at New York, New York.


Terence W. McCormick

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

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Counsel for Third-Party Roy Blankenship

on this 4th day of January 2024.

s/John R. Jacobson